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8 GEOFF WINKLER

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11 WESTERN DIVISION

12 SECURITIES AND EXCHANGE
COMMISSION,

13 Plaintiff,

14 vs.

15 RALPH T. IANNELLI and ESSEX
16 CAPITAL CORP.,

17 Defendants.

Case No. 2:18-cv-05008-FMO-AJRx

**NOTICE OF HEARING ON
NINETEENTH INTERIM
APPLICATION OF RECEIVER,
GEOFF WINKLER, AND HIS
PROFESSIONALS FOR PAYMENT
OF FEES AND REIMBURSEMENT
OF EXPENSES**

Date: April 25, 2024
Time: 10:00 a.m.
Ctm: 6D
Judge Hon. Fernando M. Olguin

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20 **TO THE HONORABLE FERNANDO M. OLGUIN, UNITED STATES**
21 **DISTRICT JUDGE, AND ALL INTERESTED PARTIES:**

22 **PLEASE TAKE NOTICE** that on April 25, 2024, at 10:00 a.m., or as soon
23 thereafter as this matter may be heard in Courtroom 6D of the above-captioned
24 Court, located at 350 W. 1st Street, 6th Floor, Los Angeles, California 90012, Geoff
25 Winkler (the "Receiver"), the Court-appointed permanent receiver for defendant
26 Essex Capital Corporation and its subsidiaries and affiliates, and his counsel of
27 record, Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins," and
28 together, with the Receiver, the "Applicants"), will jointly submit their nineteenth

1 interim application for the payment of fees and the reimbursement of expenses (the
 2 "Fee Application").

3 The Fee Application has been submitted concurrently herewith. Pursuant to
 4 the Fee Application, the Applicants seek approval, payment, and reimbursement of
 5 their respective fees and expenses incurred during the period from October 1, 2023,
 6 through December 31, 2023, as follows¹:

Applicant	Fees (Inclusive of Discounts, if any)	Expenses	Total
Receiver	\$39,497.50	\$768.33	\$40,265.83
Allen Matkins	\$84,602.07	\$6,905.20	\$91,507.27
	\$124,099.57	\$7,673.53	\$131,773.10

11 **PLEASE TAKE FURTHER NOTICE** that the Fee Application is based on
 12 this notice, the concurrently filed memorandum of points and authorities and
 13 declaration of Geoff Winkler, and any argument or evidence presented to the Court
 14 at the hearing on the Fee Application.

15 **PLEASE TAKE FURTHER NOTICE** that you may obtain a copy of the
 16 Fee Application by accessing the Receiver's website at [https://essex-](https://essex-receivership.com/)
 17 [receivership.com/](https://essex-receivership.com/) or via the United States Courts' PACER (Public Access to Court
 18 Electronic Records) system (account required) at <https://pacer.uscourts.gov/>.

19 **PLEASE TAKE FURTHER NOTICE** that, if you oppose the Fee
 20 Application, you are required to file your written opposition with the Office of the
 21 Clerk, United States District Court for the Central District of California, 255 East
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24 ¹ The Applicants request payment of their fees, on an interim basis, at a reduced
 25 80%, with the remaining 20% "holdback" subject to payment at the time of the
 26 Applicants' submission of their final fee application in this matter. Accordingly,
 27 by the Fee Application, the Applicants request that the Court authorize an interim
 28 payment of (a) the Receiver's fees and expenses in the amounts of \$31,598.00
 and \$768.33, respectively, and (b) Allen Matkins' fees and expenses in the
 amounts of \$67,681.66 and \$6,905.20, respectively.

1 Temple Street, Los Angeles, California 90012 and serve the same on the
2 undersigned not later than 21 days prior to the above-referenced hearing date.

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4 Dated: March 26, 2024

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
DAVID R. ZARO
JOSHUA A. DEL CASTILLO
MATTHEW D. PHAM

7 By: /s/ Matthew D. Pham

8 MATTHEW D. PHAM
9 Attorneys for Receiver
10 GEOFF WINKLER
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